

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

DENNIS J. DONOGHUE,  
and MARK RUBENSTEIN,

Plaintiffs,

v.

NEXTNAV INC.,

Nominal Defendant,

and

TIMOTHY M. PRESUTTI,  
and WILBUR Ed. BOSARGE, JR.,

Defendants.

**ADDENDUM to  
CONFIDENTIALITY STIPULATION and PROTECTIVE ORDER**

1. The original parties to this action entered into a Confidentiality Stipulation and Proposed Protective Order, which was ordered by the Court on February 15, 2024, at Dkt. 24 (the “Protective Order”).

2. Plaintiffs filed a First Amended Complaint on February 16, 2024, at Dkt. 25, which named Wilbur Ed. Bosarge, Jr. (“Bosarge”), as an additional Defendant.

3. Bosarge has agreed to the terms of the Protective Order, and as such, all parties to this case agree that Bosarge will be subject to the Protective Order, and that the terms of the Protective Order will apply to any Discovery Material (as defined in the Protective Order) produced to or by Bosarge in this case.

Dated: June 5, 2024

*Southerland, Dennis Oba  
6/5/24*